

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

LA UNIÓN DEL PUEBLO ENTERO, <i>et al.</i> ,	§	
	§	
<i>Plaintiffs,</i>	§	
	§	
V.	§	
	§	
STATE OF TEXAS, <i>et al.</i> ,	§	Case No. 5:21-cv-00844-XR
	§	[Lead Case]
	§	
<i>Defendants.</i>	§	
	§	
HARRIS COUNTY REPUBLICAN PARTY, <i>et al.</i> ,	§	
	§	
<i>Intervenor-Defendants.</i>	§	

**LUPE PLAINTIFFS’ UNOPPOSED MOTION TO EXTEND DEADLINE
TO FILE A REPLY IN SUPPORT OF THEIR MOTION TO COMPEL
PRODUCTION OF DOCUMENTS FROM DEFENDANTS JANE NELSON
AND JOHN SCOTT (DKT. 630)**

LUPE Plaintiffs respectfully request an extension, to July 7, 2023, of their deadline to file a reply in support of their motion to compel the production of documents from Defendants Jane Nelson and John Scott. See Dkt. 630. This motion is unopposed.

LUPE Plaintiffs filed their motion to compel on June 21, 2023. *Id.* That same day, the Court directed Defendants Nelson and Scott (“State Defendants”) to file a response by June 26, 2023, and directed LUPE Plaintiffs to file a reply, if any, by June 28, 2023. Dkt. 631. The motion has been set for an in-person hearing on July 11, 2023. Dkt. 649.

On June 26, 2023, State Defendants filed their response. Dkt. 650. In that response, State Defendants stated that they “agreed to produce certain documents in redacted form that should hopefully resolve much, if not all of [LUPE] Plaintiffs’ concerns” regarding documents withheld on the basis of the attorney-client privilege. *See id.* at 12. In addition, State Defendants indicated

that “four documents were unprivileged and would be included in State Defendants’ next rolling production.” *Id.* at 5.

LUPE Plaintiffs have not yet received the documents that State Defendants stated they will produce. Because this information may narrow the scope of the disputes for the Court’s consideration, LUPE Plaintiffs respectfully seek an extension for the deadline to file their reply in support of their motion to compel. Accordingly, LUPE Plaintiffs respectfully request that their unopposed motion be granted, and that their deadline to file their reply in support of their motion to compel be extended to July 7, 2023. *See* Dkt. 630.

Dated: June 28, 2023

Respectfully Submitted,

/s/ Nina Perales

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CERTIFICATE OF CONFERENCE

I hereby certify that, on June 27, 2023, counsel for LUPE Plaintiffs emailed counsel for State Defendants and Defendant Intervenors regarding the instant motion. Counsel for State Defendants and Defendant Intervenors indicated that they do not oppose the motion.

/s/ Nina Perales
Nina Perales

CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that she has electronically submitted a true and correct copy of the above and foregoing via the Court's electronic filing system on the 28th day of June 2023.

/s/ Nina Perales
Nina Perales